

May 6, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

Re: Petition of PPL Electric Utilities Corporation for Approval of Its Default Service Plan for the Period June 1, 2021 through May 31, 2025; Docket No. P-2020-3019356

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of the Industrial Energy Consumers of Pennsylvania ("IECPA"), in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 

Derrick Price Williamson
Barry A. Naum

BAN/sds
Enclosures

c: Administrative Law Judge Elizabeth Barnes (via E-mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of Its Default Service Plan for : Docket No. P-2020-3019356
the Period June 1, 2021 through May 31, :
2025 :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

VIA E-MAIL

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Barry A. Naum

Dated: May 6, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of Its Default Service Plan for : Docket No. P-2020-3019356
the Period June 1, 2021 through May 31, :
2025 :

**PETITION TO INTERVENE OF
THE INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, Industrial Energy Consumers of Pennsylvania ("IECPA"), hereby file this Petition to Intervene in the above-captioned proceeding.

In support thereof, IECPA states as follows:

1. Petitioner is IECPA. The composition of IECPA at this point in time for purposes of this proceeding is attached as Appendix "A." Appendix "A" will be updated as necessary.

2. The name and address of Petitioners' attorneys are:

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3. On March 25, 2020, PPL Electric Utilities Corporation ("PPL" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition for approval of its fifth Default Service Program and Procurement Plan ("DSP V") for the period from June 1, 2021 through May 31, 2025.

4. IECPA is an association of energy-intensive industrial consumers taking service from PPL primarily pursuant to the Company's current industrial distribution and transmission rates. The cost of electricity received from PPL is a significant element in the cost of operation for IECPA member. The Commission's action in this case may therefore have a significant impact on IECPA's members.

5. Although IECPA's members avail themselves of the competitive market in Pennsylvania for their generation supply, of particular and certain concern to IECPA is PPL's indication in its filing that it will continue to allocate both capacity and transmission costs among all of its customers, through calculations of Peak Load Contributions ("PLCs") and Network Service Peak Loads ("NSPLs"), respectively, on the basis of 5 Coincident Peaks ("CP"). Particularly as it relates to the allocation of transmission costs, IECPA is concerned that PPL's methodology, by not matching NSPL calculations to PJM Interconnection, LLC's ("PJM") absolute coincidental peak, does not align the retail costs it recovers from its customers with the wholesale costs that PPL incurs for transmission on the PJM system. This makes it very difficult for customers to monitor and manage their peak consumption. Such management is critical not only to these customers, but it also provides an important peak reduction benefit to the entire PPL system.

6. The Commission's resolution of PPL's DSP V may directly impact the costs, terms, and conditions of the electric service that IECPA members receive from the Company. IECPA therefore has a direct, substantial, and unique interest in the outcome of this proceeding that is not represented by any other party. See 52 Pa. Code § 5.72(a)(2) & (3).

WHEREFORE, the Industrial Energy Consumers of Pennsylvania requests that the Commission grant this Petition to Intervene and provide IECPA with full party status in this proceeding.

Respectfully submitted,

By 

Derrick Price Williamson (Pa. I.D. No. 69274)

Barry A. Naum (Pa. I.D. No. 204869)

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Counsel to Industrial Energy Consumers of Pennsylvania

Dated: May 6, 2020

VERIFICATION

I, Barry A. Naum, Counsel to Industrial Energy Consumers of Pennsylvania, hereby state that the factors set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: May 6, 2020



Barry A. Naum

APPENDIX A
MEMBERS OF
THE INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA

Air Products and Chemicals, Inc.

ArcelorMittal USA LLC

Arconic, Inc.

Benton Foundry, Inc.

Carpenter Technology Corp.

Keystone Cement

Praxair, Inc.

United States Gypsum Company